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Attorney for Defendant
Daniel Joe Bobian

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,) 2:20-CR-35-JAM
Plaintiff,)
v.) STIPULATION AND ORDER
) TO CONTINUE JUDGMENT
) AND SENTENCING
OBDULIO JIMENEZ,)
DANIEL JOE BOBIAN,)
JOSE MANUEL AGUILERA BARBOSA,)
Defendants.)

STIPULATION

Plaintiff, United States of America, by and through its counsel, Assistant United States Attorney James R. Conolly and defendant, Daniel Joe Bobian, by and through his counsel, Jennifer Mouzis, agree and stipulate to vacate the date set for judgment and sentencing, September 27, 2022 at 9:30 a.m., in the above-captioned matter, and to continue the judgment and sentencing to November 8, 2022 at 9:00 a.m. in the courtroom of the Honorable John A. Mendez. Federal Probation Officer, Miranda Lewis, also agrees to this change.

In addition, the parties stipulate to the following modification to the schedule of disclosure relating to the pre-sentence report (“PSR”):

1 Draft PSR September 27, 2022
2 Written objections to the PSR October 11, 2022
3 Final PSR October 18, 2022
4 Formal objections to PSR October 25, 2022
5 Reply, or Statement of Non-Opposition November 1, 2022

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7 The reason for the continuance is that the Defense and Probation could not schedule
8 meetings with the inmate who is in custody.

9 Accordingly, the parties respectfully request the Court adopt this proposed stipulation.

10 IT IS SO STIPULATED.

11 Dated: September 22, 2022

PHILLIP A. TALBERT
United States Attorney

12 By: /s/ James R. Conolly
13 JAMES R. CONOLLY
14 Assistant United States Attorney

15 Dated: September 22, 2022

/s/ Jennifer Mouzis
JENNIFER MOUZIS
16 Attorney for Defendant
Daniel Joe Bobian

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ORDER

For the reasons set forth in the accompanying stipulation, the judgment and sentencing date of September 27, 2022, at 9:30 a.m. is VACATED and the above-captioned matter is set for judgment and sentencing on November 8, 2022, at 9:00 a.m.

It is FURTHER ORDERED that the schedule of disclosure be modified as follows:

Draft PSR	September 27, 2022
Written objections to the PSR	October 11, 2022
Final PSR	October 18, 2022
Formal objections to PSR	October 25, 2022
Reply, or Statement of Non-Opposition	November 1, 2022

IT IS SO ORDERED.

Dated: September 23, 2022

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE